

Messrs. Debes and Burch are expected to testify as to the reasonableness and necessity of the attorneys' fees, costs, and expenses incurred by Plaintiffs in prosecuting this suit. It is anticipated that testimony regarding attorneys' fees and costs will be presented to the Court, live or via affidavit, post-trial and assuming Plaintiffs are prevailing parties. It is further anticipated that evidence supporting Mr. Debes' and Mr. Burch's testimony will be provided to counsel for Defendant prior to any hearing the Court will hold on the matter, or as otherwise directed by the Court.

Data or other information considered by the witness in forming his opinion, and any exhibits to be used as a summary of or support of the opinions.

Prior to testifying, Messrs. Debes and Burch will review 1) their time records and case expenses related to this case; and 2) the documents exchanged in this matter (i.e. pleadings, correspondence, discovery, emails, documents produced in discovery, etc...). To the extent required by the Court, said records will be submitted as exhibits upon the trial of this case.

Compensation to be paid for the study and testimony

No study has been commissioned. Time spent testifying will be paid at the hourly rate set by the Court.

Qualifications of the witnesses

Robert R. Debes, Jr. is a shareholder and managing/founding partner of Debes Law Firm. He is admitted to practice in all Texas state and federal courts. Mr. Debes is a member of the National Employment Lawyers Association (NELA), the NELA Wage and Hour Committee, Texas Employment Lawyers Association, American Bar Association, Houston Bar Association – Labor & Employment Section, and Texas Trial Lawyers Association, among others. Mr. Debes has seventeen

(17+) years of experience in the handling of civil litigation matters, including extensive experience in the investigation and prosecution of employment matters and wage disputes.

Mr. Debes regularly represents employees in multi-party actions arising under a variety of laws governing the workplace.

Mr. Burch is a shareholder in the A-V rated law firm of Bruckner Burch, PLLC. He is admitted to practice in numerous federal courts, as well as all Texas state courts. Mr. Burch is a member of the American Bar Association's Fair Labor Standards Committee and the national Employment Lawyers Association – where he currently serves as a member of the Wage and Hour Committee. Mr. Burch has also served as an adjunct professor at the University of Houston Law Center, teaching a course in civil trial advocacy.

Mr. Burch represents employers and employees in multi-party actions arising under a variety of laws governing the workplace. In addition to having successfully represented clients in jury and bench trials, Mr. Burch has successfully negotiated the dismissal of charges of discrimination, Department of Labor Investigations and lawsuits. His cases have been featured in the American Bar Journal, National Law Journal, and various newspapers across the country. Recently, Mr. Burch was named "Super Lawyer," and "Rising Star" by the Texas Lawyer and Texas Monthly magazines, as well as listed in "Best Lawyers in America" for Labor & Employment law.

Listing of all publications authored by the witness within the preceding ten years

Mr. Debes has not published any articles within the last ten (10) years.

Mr. Burch has published the following articles within the last ten (10) years:

ARTICLE	PUBLISHER/VENUE	DATE
Evaluating Wage and Hour Claims: A Plaintiff's Lawyer Perspective <i>Advanced Employment Law for Employers and Employment Lawyers</i>	University of Houston Law Center Houston & Dallas Texas	November 2006
Pursuing and Defending FLSA Collective Actions <i>Advanced Employment Law Seminar</i>	University of Texas Law School <i>Austin, Texas</i>	May 2006
FLSA Overtime Litigation Plaintiff's and Defendant's Respective	University of Houston Law Center Houston & Dallas Texas	April 2006
Class Actions Under the Fair Labor Standards Act	Texas General Counsel's Forum <i>Dallas, Texas</i>	March 2005
Litigating Collective Actions Under the Fair Labor Standards Act	Houston Bar Association: Laborr & Employment Section	June 2004
Protecting Employee Rights under the FLSA, FMLA & Equal Pay Act (Contributing Author)	National Employment Lawyers Association <i>San Francisco, California</i>	March 2003
A Practitioner's Guide to Joint Employer Liability Under the FLSA	Houston Business and Tax Law Journal	December 2002
Mastering the Trial Notebook in Texas (Contributing Author)	NBI, Inc. <i>Houston, Texas</i>	March 2002

Respectfully submitted,

/s/ Robert R. Debes, Jr.

By:

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CERTIFICATE OF CONFERENCE

This filing does not seek an order from, nor require any action by, the Court. Accordingly, no certificate of conference is required.

/S/ Robert R. Debes, Jr.

Robert R. Debes, Jr.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing instrument was forwarded to all counsel of record via Notice of Electronic Filing on known Filing Users, or by courier, certified mail (return receipt requested), facsimile transmittal, and/or first class mail delivery on unknown Filing Users on this the 6th day of September, 2007.

/S/ Robert R. Debes, Jr.

ROBERT R. DEBES, JR.